

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RE: PETITION OF CAPE LIGHT COMPACT ET AL.

FOR APPROVAL OF AGGREGATION PLAN DTE 00-47

REQUEST TO EXTEND DEADLINE FOR COMPLIANCE FILING

The Cape Light Compact and its member towns and counties ("Compact") hereby respectfully request that the Department extend the deadline for the Compact's compliance filing in this docket, DTE 00-47, from September 11, 2000 to September 18, 2000. In support of this motion, the Compact states:

1. The Department issued its Order in DTE 00-47 on August 10, 2000. The Order directed the Compact to "submit a compliance filing consistent with the requirements of this Order within thirty days of the issuance thereof." Given that the 30th day after issuance of the Order falls on Saturday, September 9, the filing would be due Monday, September 11.
2. Since the Department released its Order, the Compact has drafted a proposed compliance filing that addresses the methods for enrolling customers in its Aggregation Program. The Compact has discussed that draft with the two other parties that will be directly involved in implementation, Commonwealth Electric Company, the local distribution company, and Select Energy, Inc., the Compact's competitive generation supplier.
3. The Compact seeks additional time to make the compliance filing in order to reach agreement with the other parties directly involved in implementation.
4. Commonwealth Electric Company and the Office of the Attorney General have assented to this motion.⁽¹⁾

5. The requested continuance will not prejudice any party as the Compact will not be implementing its power supply program until December, 2000 at the earliest.

WHEREFORE, the Compact asks that the Department grant its motion.

September 6, 2000 Respectfully Submitted,

CAPE LIGHT COMPACT et al.

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1. ¹ The Compact was unable to reach the Division of Energy Resources prior to filing this motion.